

AHMAD KESHAVARZ

Attorney at Law

16 COURT ST., #2600
BROOKLYN, NY 11241

WWW.NEWYORKCONSUMERATTORNEY.COM
E-mail: ahmad@NewYorkConsumerAttorney.com

Telephone: (718) 522-7900
Fax: (877) 496-7809

July 7, 2023

VIA ECF

Magistrate Judge Lois Bloom
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Joint Request to Extend Discovery Deadlines by 60 Days.

Texidor v. Tromberg, Morris & Poulin, PLLC, et al., No. 1:21-cv-04845-RPK-LB

Dear Judge Bloom:

The undersigned represents the Plaintiff Luz Texidor in this lawsuit against Defendants Tromberg, Morris & Poulin, PLLC f/k/a Stephen Einstein & Associates, P.C. (“Tromberg”), Stephen Einstein (collectively with Tromberg, “Tromberg Defendants”), Collins Asset Group, LLC (“CAG”), ABC Process Serving Bureau, Inc. d/b/a ABC Process Service (“ABC”), Jay Brodsky (“ABC Defendants”), and Azzam Abderrahman¹ for violations of the FDCPA and related state law.

The parties jointly request an extension of the discovery deadline from August 11, 2023 to October 11, 2023. The basis for this request is that conflicting schedules of counsel for the parties, including but not limited to vacations, have delayed depositions of Defendants until the week of July 31, 2023. Plaintiff offered August 9 for Plaintiff’s deposition, but counsel for Tromberg Defendants is not available that week, and requested a date for Plaintiff’s deposition following August 14, 2023. Further, Plaintiff does not want to be prejudiced if additional previously-unknown issues come up during the depositions that require additional discovery.

Accordingly, the parties jointly request an extension of the discovery deadline from August 11, 2023 to October 11, 2023. The deadline for discovery was previously extended by Your Honor from July 17, 2023 to August 11, 2023. This extension would, per the rules of the Honorable Judge Rachel P. Kovner, extend the deadline for pre-motion letters for dispositive motions following the close of discovery from the current deadline of September 15, 2023 to November 10, 2023.

Respectfully,

/s/

Emma Catherine, Esq.

¹ Mr. Abderrahman has not appeared in this action. Further, discovery is currently stayed as to ABC Defendants pending a decision on their Motion to Dismiss. Any references to “Defendants” only references Tromberg Defendants and CAG.